

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Jacqueline Marcus
Garrett A. Fail
Sunny Singh
Jared R. Friedmann

*Attorneys for Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	x	
	:	
SEARS HOLDINGS CORPORATION, et al.,	:	Chapter 11
	:	
Debtors.¹	:	Case No. 18-23538 (RDD)
	:	
Debtors.¹	:	(Jointly Administered)
	x	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
TO BE CONDUCTED THROUGH ZOOM ON NOVEMBER 10, 2021 AT 10:00 A.M.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Robert D. Drain, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, New York 10601

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway, 19th Floor, New York, NY 10019.

PLEASE TAKE NOTICE, the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) has entered General Order M-543 to protect public health, and in recognition of the national emergency that was declared by the President of the United States on March 13, 2020, the Bankruptcy Court provided that all conferences scheduled to be held in the courthouse comprising the White Plains Division will be conducted through Zoom for Government. All attorneys, witnesses and parties wishing to appear at, or attend, a Zoom hearing or conference register using the Court’s eCourt Appearances tool, <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Pro se parties may participate in the hearing free of charge using Zoom. Further instructions for making an electronic Court Appearance and additional information on the Court’s Zoom procedures can be found at <https://www.nysb.uscourts.gov/content/judge-robert-d-drain>.

I. OMNIBUS OBJECTIONS:

1. Debtors’ Twenty-First Omnibus Objection to Proofs of Claim or Ballots (Reclassified/Disallowed Claims) **[ECF No. 8451]**

Response Deadline: October 9, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Patricia Adams Response **[ECF No. 8473]**
- B. Debtors’ Supplemental Objection and Reply in Support **[ECF No. 10002]**
- C. Reply of Beau Brady LeBaron **[ECF No. 10058]**

Related Documents: None.

Status: This matter is going forward solely with respect to Claimant Patricia Adams.

2. Debtors Twenty-Third Omnibus Objection to Proofs of Claim (No Liability Claims) **[ECF No. 9284]**

Response Deadline: March 2, 2021 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Response of Joonhee Paek **[ECF No. 9304]**
- B. Response of Lorraine Majeski **[ECF No. 9315]**
- C. Response of Lorraine Majeski **[ECF No. 10044]**
- D. Objection of Beau LaBaron **[ECF No. 9333]**
- E. Objection of Beau LaBaron **[ECF No. 9539]**

- F. Objection of Marshall Lindquist [**ECF No. 9339**]
- G. Objection of Puja Thakkar [**ECF No. 9340**]
- H. Reply of Beau Brady LeBaron [**ECF No. 10058**]

Related Document:

- I. Debtors' Supplemental Objection and Reply in Support [**ECF No. 10002**]

Status: This matter is going forward solely with respect to Claimants Joonhee Paek, Lorraine Majeski, Beau LaBaron, Marshall Lindquist, and Puja Thakkar.

- 3. Debtors' Thirty-First Omnibus Objection to Proofs of Claim (Reclassify Secured Claims) [**ECF No. 9658**]

Response Deadline: August 24, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Debtors' Reply in Support [**ECF No. 10024**]

Related Documents: None.

Status: This matter is going forward solely with respect to Herbert Bass.

- 4. Debtors' Thirty-Third Omnibus Objection to Proofs of Claim (To Reclassify or Disallow Claims) [**ECF No. 9787**]

Response Deadline: September 27, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Debtors' Reply in Support [**ECF No. 10024**]

Related Documents: None.

Status: This matter is going forward solely with respect to Ebrahim Mirjalili.

- 5. Debtors' Thirty-Sixth Omnibus Objection to Proofs of Claim (Reclassifying Claims) [**ECF No. 9975**]

Response Deadline: November 2, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Response of Kingdom Seekers Inc. [**ECF No. 10031**]

Related Documents: None.

Status: This matter is going forward solely with respect to Kingdom Seekers Inc.

II. ADVERSARY PROCEEDINGS:

6. Kmart Holding Corporation, *et al.* v. Winning Resources Limited [Adversary Proceeding No. 20-06480]

Motion to Dismiss Adversary Proceeding

Related Documents:

- A. Adversary Complaint [**ECF No. 1**]
- B. Answer to Complaint [**ECF No. 5**]
- C. Second Summons [**ECF No. 10**]
- D. Motion to Dismiss [**ECF No. 11**]
- E. Declaration of David H. Wander in Support **ECF No. 12**
- F. Declaration of Syed Mohi in Support [**ECF No. 13**]
- G. Plaintiff's Objection [**ECF No. 14**]
- H. Defendant's Reply in Support [**ECF No. 15**]
- I. Declaration of Terence G. Banich in Support of Plaintiffs Objection [**ECF No. 19**]
- J. Supplemental Declaration by David H. Wander in Support of Motion to Dismiss [**ECF No. 21**]
- K. Plaintiff's Response to Supplemental Declaration of David H. Wander in Support of Motion to Dismiss [**ECF No. 23**]
- L. Notice of Adjournment of Hearing [**ECF No. 24**]

Status: This matter is going forward.

7. Kmart Holding Corporation, *et al.* v. Cleva Hong Kong Ltd. [Adversary Proceeding No. 20-06594]

Motion to Dismiss Adversary Proceeding

Related Documents:

- A. Motion to Dismiss Adversary Proceeding [**ECF No. 4**]

- B. Declaration of Hong Chen [**ECF No. 5**]
- C. Notice of Hearing [**ECF No. 6**]
- D. Memorandum of Law in Opposition [**ECF No. 12**]
- E. Cleva Hong Kong Ltd.'s Reply in Support [**ECF No. 14**]
- F. Declaration of Michael R. Herz, Esp. in Support [**ECF No. 15**]

Status: This matter is going forward.

III. ADJOURNED MATTERS:

- 8. Debtors' First Omnibus Objection to Proofs of Claim (Satisfied Claims) [**ECF No. 4775**]

Response Deadline: August 27, 2019 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Response of Johnson Controls, Inc. [**ECF No. 4983**]

Related Document:

- B. Notice of Adjournment [**ECF No. 10043**]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

- 9. Debtors' Ninth Omnibus Objection to Proofs of Claim (Reclassification as General Unsecured Claims) [**ECF No. 5236**]

Response Deadline: October 16, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Eric Jay Ltd.'s Opposition [**ECF No. 5498**]
- B. Eric Jay Ltd.'s Opposition [**ECF No. 5508**]

Related Document:

- C. Notice of Adjournment [**ECF No. 10043**]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

- 10. Debtors' Eighteenth Omnibus Objection to Proofs of Claim or Ballots (Reduced or Reclassified Claims/Ballots) [**ECF No. 7859**]

Response Deadline: May 19, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Response of Johnson Controls, Inc. [ECF No. 7945]

Related Document:

- B. Notice of Adjournment [ECF No. 10043]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

11. Debtors' Twentieth Omnibus Objection to Proofs of Claim (Reduced/Reclassified Claims) [ECF No. 8019]

Response Deadline: June 30, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Response of Electrolux Home Products, Inc. [ECF No. 8190]

Related Document:

- B. Notice of Adjournment [ECF No. 10043]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

12. Debtors' Twenty-First Omnibus Objection to Proofs of Claim or Ballots (Reclassified/Disallowed Claims) [ECF No. 8451]

Response Deadline: October 9, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Shaghaf Ltd.'s Response [ECF No. 8495]

- B. Debtors' Supplemental Objection and Reply in Support [ECF No. 10002]

Related Document:

- C. Notice of Adjournment [ECF No. 10043]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

13. Debtors Twenty-Third Omnibus Objection to Proofs of Claim (No Liability Claims) [ECF No. 9284]

Response Deadline: March 2, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Opposition of Cheryl Romanchuk [**ECF No. 9338**]

Related Documents: None.

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

14. Debtors' Thirty-Sixth Omnibus Objection to Proofs of Claim (Reclassifying Claims) [**ECF No. 9975**]

Response Deadline: November 2, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Response of Margaret DenBeste [**ECF No. 10016**]

Related Documents: None.

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

15. Debtors' Twenty-Seventh Omnibus Objection to Proofs of Claim (Reclassify or Disallow Claims) [**ECF No. 9403**]

Response Deadline: May 3, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Response of Regal Home Collection Inc. [**ECF No. 9433**]

Related Document:

- B. Notice of Adjournment [**ECF No. 10043**]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

16. Koolatron Corporation's Motion to Compel Payment of Reserved Funds Held Pursuant to the Administrative Expense Claims Consent Program and any Additional Amount Due and Owing [**ECF No. 9417**]

Response Deadline: May 18, 2021 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Debtors' Objection [**ECF No. 9505**]

Related Document:

- B. Notice of Adjournment [**ECF No. 9670**]

Status: This matter has been adjourned to a date to be determined.

17. Debtors' Twenty-Ninth Omnibus Objection to Proofs of Claim and Ballots (Reduce and Allow) **[ECF No. 9444]**

Response Deadline: May 17, 2021 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Response of Colonial Properties LLC **[ECF No. 9577]**
- B. Response of Colgate-Palmolive Company Distr. LLC **[ECF No. 9580]**

Related Document:

- C. Notice of Adjournment **[ECF No. 10043]**

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

18. Debtors' Thirty Seventh Omnibus Objection to Proofs of Claim (Reclassifying Claims) **[ECF No. 9976]**

Response Deadline: November 2, 2021 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Response of Gator Oeste Owner, LLC **[ECF No. 10019]**
- B. Response of Diana Bos **[ECF No. 10026]**
- C. Response of Nelecia Nelson **[ECF No. 10028]**
- D. Response of Conyus A. Watkins **[ECF No. 10029]**

Related Documents:

- E. Certificate of No Objection **[ECF No. 10037]**
- F. Notice of Adjournment **[ECF No. 10043]**

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET)

19. Debtors' Thirty-Ninth Omnibus Objection to Proofs of Claim (Disallow, Reduce or Reclassify) **[ECF No. 9978]**

Response Deadline: November 2, 2021 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Response of Ohio Department of Taxation [**ECF No. 10009**]
- B. Response of Crown Equipment Corporation [**ECF No. 10017**]
- C. Response of RGDD, Inc. [**ECF No. 10018**]

Related Documents:

- D. Certificate of No Objection [**ECF No. 10039**]
- E. Notice of Adjournment [**ECF No. 10043**]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET)

20. Claimant's Motion for Relief from Automatic Stay to Permit Prosecution of Pending Personal Injury Matter [**ECF No. 9981**]

Response Deadline: November 3, 2021 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

Related Document:

- A. Notice of Hearing [**ECF No. 9992**]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

21. Kmart Holding Corporation v. All In One PR Multiservices LLC [Adversary Proceeding No. 19-08316]

Motion for Default Judgement

Related Documents:

- A. Clerk's Entry of Default against All In One PR Multiservices LLC [**ECF No. 9**]

B. Motion for Default Judgement [**ECF No. 11**]

C. Jonathan Rivera's Opposition [**ECF No. 12**]

Status: This matter has been adjourned to December 14, 2021 at 10:00 a.m. (ET).

Dated: November 9, 2021
New York, New York

/s/ Garrett A. Fail
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Ray C. Schrock, P.C.
Jacqueline Marcus
Garrett A. Fail
Sunny Singh
Jared R. Friedmann

*Attorneys for Debtors and
Debtors in Possession*